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13     UNITED STATES DISTRICT COURT

14     NORTHERN DISTRICT OF CALIFORNIA

15     SAN FRANCISCO DIVISION

16     MAXIMILIAN KLEIN, et al.,

17     Plaintiffs,

18     v.

19     META PLATFORMS, INC.,

20     Defendant.

21     Case No. 3:20-cv-08570-JD

22     Hon. James Donato

23     **DECLARATION OF BRIAN J. DUNNE IN  
SUPPORT OF ADVERTISER  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
META PLATFORMS, INC.'S MATERIAL  
SHOULD BE SEALED**

I, Brian J. Dunne, declare and state as follows:

2       1. I am an attorney licensed in the State of California and admitted to the United States  
3 District Court for the Northern District of California. I am a partner at Bathaee Dunne LLP, counsel  
4 for Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set  
5 forth here and, if called as a witness, could and would testify competently to them.

6       2. This declaration is made in support of Advertiser Plaintiffs' Administrative Motion to  
7 Consider Whether Meta Platforms, Inc.'s Material Should Be Sealed, filed in connection with the  
8 concurrently filed Advertiser Plaintiffs' Opposition to the Omnibus Motion to Seal Materials  
9 Submitted in Connection with Summary Judgment and *Daubert* Briefing in the Advertiser Case  
10 ("Opposition").

11       3.     Certain documents and information referenced in the Opposition have been designated  
12 by Defendant Meta Platforms, Inc. (“Meta”) as “Confidential” or “Highly Confidential” under the  
13 Protective Order in this action.

14       4. Portions of the Opposition referencing or reflecting the contents of the documents or  
15 information designated by Meta as “Confidential” or “Highly Confidential” have been redacted from  
16 the publicly filed version of the Opposition. *See Civil L.R. 79-5(e)(1).*

17       5. An unredacted version of the Opposition with these references highlighted in yellow  
18 is filed herewith. *See Civil L.R. 79-5(e)(2), (f)(1).*

19       6.      Advertiser Plaintiffs' request in this motion is limited to documents and information  
20 produced by Meta marked "Confidential" or "Highly Confidential," or information directly reflecting  
21 documents and information produced by Meta marked "Confidential" or "Highly Confidential." This  
22 request is thus narrowly tailored to seek temporary sealing only of potentially sealable material.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed on March  
24 18, 2025, in Austin, Texas.

/s/ Brian J. Dunne  
Brian J. Dunne